

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**BARBARA H. LEE, et al.,**

**Plaintiffs,**

**V.**

**VIRGINIA STATE BOARD OF  
ELECTIONS, et al.,**

**Defendants.**

**Civil Action No.: 3:15-cv-357**

**MOTION TO INTERVENE OF SENATOR MARK OBENSHAIN,  
VIRGINIA COUNTY ELECTION OFFICIALS, AND VIRGINIA VOTERS**

Proposed Intervenor Senator Mark Obenshain, Tammy Alexander, Sherman Cain, Tony Guiffre, Dawn Williams, Frank Birkhead, Joan Elaine Salm, John William Salm, III, Tom Lester, and Jean Gannon, move to intervene as defendants in this case under Federal Rule of Civil Procedure 24.<sup>1</sup> Each of the Proposed Intervenor has a strong interest in protecting the voting laws of the Commonwealth of Virginia that Plaintiffs seek to challenge. This strong interest will be harmed if Plaintiffs' requested relief is granted, and no existing defendant will adequately represent it. Defendants have consented to this requested intervention. Plaintiffs oppose this intervention. The Court should grant the motion to intervene as of right or, in the alternative, permissive intervention.

<sup>1</sup> Because Plaintiffs are scheduled to file an amended complaint on August 14, Proposed Intervenor cannot yet file an answer as contemplated by Fed. R. Civ. P. 24(c). Proposed Intervenor suggests that they be required to file an answer on August 28 (the same day the named Defendants' answer is due) or seven days after this Motion is granted, whichever is later.

Dated: August 14, 2015

Respectfully submitted,

/s/ Mark R. Lentz

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Anthony J. Dick (*pro hac vice* to be filed)

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**CERTIFICATE OF SERVICE**

I certify that on August 14, 2015, a copy of the Motion to Intervene was filed electronically with the Clerk of Court using the ECF system which will send notification to the following ECF participants:

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